

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

MANIKANTA PASULA, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	No. 1:25-cv-00156-SE-TSM
)	
DEPARTMENT OF HOMELAND)	
SECURITY, <i>et al.</i> ,)	
)	
Defendants.)	
)	
)	

CONSENT MOTION FOR EXTENSION OF TIME

Defendants, through undersigned counsel, hereby submit this Consent Motion for Extension of Time to (1) answer or otherwise respond to Plaintiffs’ Complaint, ECF No. 1, by 30 days from July 18, 2025, to August 18, 2025,¹ and (2) respond to Plaintiffs’ Motion for Class Certification and Appointment of Class Counsel; Request for Expedited Treatment, L.R. 7.1(f), ECF No. 4, by sixty (60) days from July 29, 2025, to September 29, 2025.²

On April 18, 2025, Plaintiffs commenced the instant action, ECF No. 1, filed a motion for class certification, ECF No. 4, and a motion for preliminary injunction, ECF No. 5. On May 7, 2025, the Court held a hearing on Plaintiffs’ motion for preliminary injunction. The Court denied Plaintiffs’ motion. This Court has previously granted two unopposed motions to extend Defendants’ deadline to answer or otherwise respond to the complaint. Defendants’ current deadline to answer or otherwise respond is July 18, 2025. The Court has previously granted one

¹ Thirty days from July 18, 2025 is Sunday, August 17, 2025. Monday, August 18, 2025, is the first business day thereafter.

² Sixty days from July 29, 2025 is Saturday, September 27, 2025. Monday, September 29, 2025, is the first business day thereafter.

unopposed motion to extend Defendants' deadline to respond to the motion for class certification. Defendants' current deadline to respond is July 29, 2025.

The parties are presently engaged in limited discovery ordered by the Court at the hearing on Plaintiffs' motion for preliminary injunction, and reached an agreement as to the scope of those requests as of July 15, 2025. Moreover, the parties are presently engaged in discussions to resolve this matter without further litigation. Defendants now respectfully request a further extension of the aforementioned deadlines, which Plaintiffs do not oppose, in order to continue toward working on a resolution of this matter.

Defendants submit that they are not requesting an extension for the purpose of undue delay and that the extension will not prejudice either party. Good cause, therefore, supports this consent motion requesting a 30-day extension of time to answer or otherwise respond to the complaint and a 60-day extension of time to address the motion for class certification. Accordingly, Defendants request that the Court extend Defendants' deadline to answer or otherwise respond to the complaint from July 18, 2025, to August 18, 2025, extend Defendants' deadline to respond to the motion for class certification from July 29, 2025, to September 29, 2025, and correspondingly extend Plaintiffs' deadline to file their reply in support of the motion for class certification from August 12, 2025 to October 13, 2025.³

³ Sixty days from August 12, 2025 is Saturday, October 11, 2025. Monday, October 13, 2025, is the first business day thereafter.

Dated: July 18, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

GLENN M. GIRDHARRY
Acting Deputy Director

ALEXANDRA MCTAGUE SCHULTE
Senior Litigation Counsel

By : s/ Alessandra Faso
ALESSANDRA FASO
Acting Assistant Director
United States Department of Justice
Civil Division
Office of Immigration Litigation
General Litigation and Appeals
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Tel: (202) 305-9855
Email: alessandra.faso@usdoj.gov

CERTIFICATE OF SERVICE

I certify that on July 18, 2025, electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will provide electronic notice and an electronic link to this document to all attorneys of record:

SangYeob Kim
Chelsea Eddy
Gilles R. Bissonnette
American Civil Liberties Union of New Hampshire
18 Low Ave
Concord, NH 03301
603 224-5591
SangYeob@aclu-nh.org
chelsea@aclu-nh.org
Gilles@aclu-nh.org

By: *s/ Alessandra Faso*
ALESSANDRA FASO
Acting Assistant Director
United States Department of Justice
Civil Division

Carol Garvan
Zachary L. Heiden
American Civil Liberties Union Foundation
PO Box 7860
Portland, ME 04112
207-619-8687
cgarvan@aclumaine.org
zheiden@aclumaine.org

Fermin L Arraiza-Navas
American Civil Liberties Union
416 Ponce de Leon Avenue, Suite 1105
San Juan, PR 00918
787-753-8493
arraizanavasfermin@gmail.com

Lynette J. Labinger
Labinger Law Office
128 Dorrance St, Ste Box 710
Providence, RI 02903
401-465-9565
ll@labingerlaw.com

Ronald L. Abramson
Shaheen & Gordon PA
1155 Elm Street, Suite 300
Manchester, NH 03101
603-792-8472
rabramson@shaheengordon.com